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Attorney for Defendant
AARON IRIBE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

| | | |
|----------------------------------|---|-------------------------------------|
| UNITED STATES OF AMERICA, |) | 2:21-CR-00189-KJM |
| |) | |
| Plaintiff, |) | UNOPPOSED MOTION TO MODIFY |
| |) | CONDITIONS OF RELEASE; |
| v. |) | [PROPOSED] ORDER. |
| |) | |
| AARON IRIBE, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

Aaron Iribé hereby moves this Court for an order eliminating the location monitoring conditions of his pretrial release (ECF 24, Conditions 14 and 15). He has performed well on supervision for the last two years. Pretrial services recommends the proposed modification. Given the recommendation of Pretrial Services to remove the location monitoring condition, as well as the bond that has been posted, the United States does not oppose removal of location monitoring.

Aaron Iribé has been working incredibly hard to maintain strict compliance with his release conditions. He was released on December 6, 2021. Mr. Iribé returned to reside with his wife and children. Mr. Iribé works full time for Superior Grocers in Tulare, CA. Mr. Iribé graduated from the BCCP (Better Choices Court Program) program on December 14, 2022. His

1 Pretrial Services Officer, Frank Guerrero, recommends the removal of the location monitoring
2 conditions of his pretrial supervision. The government does not oppose this request.

3 Under these circumstances, the location monitoring condition is no longer among the
4 least restrictive conditions reasonably necessary to assure either his appearance in court or the
5 safety of the community. For the aforementioned reasons, the Bail Reform Act supports the
6 requested modification, and we ask the Court to grant Mr. Iribes unopposed motion.
7


8 Dated: January 25, 2024

/s/ Jennifer Mouzis
JENNIFER MOUZIS
Attorney for Defendant
AARON IRIBE

11
12 **~~(PROPOSED)~~ ORDER**

13 The Court hereby modifies the Order Setting Conditions of Pretrial Release for Aaron
14 Iribes [ECF 24] to remove Conditions 14 and 15. All other conditions previously imposed remain
15 in full force and effect.

16
17 Dated: January 26, 2024


United States Magistrate Judge Jeremy D. Peterson